

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

IN THE MATTER OF THE SEARCH OF
PRIORITY MAIL EXPRESS PACKAGE
TRACKING NUMBER EI115082803US

Case No. 3:21-MJ-411

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, **Joseph Rossiter**, being first duly sworn, hereby depose and state as follows:

1. I am a United States Postal Inspector and have been since May 2016. I am presently assigned to the Cincinnati Field Office of the United States Postal Inspection Service, Pittsburgh Division, with investigative responsibility for southeast Indiana and southern Ohio. Part of my responsibility involves investigating the use of the United States Mail in the transportation of narcotics, other dangerous controlled substances, and financial proceeds from, or instrumentalities used in, the sale of such narcotics and controlled substances (hereinafter, "Drugs and/or Proceeds").
2. Based on my training and experience as a United States Postal Inspector, I have become aware that drug traffickers frequently use United States Priority Mail Express (overnight) or Priority Mail (2-3-day) to transport Drugs and/or Criminal Proceeds. Additionally, as a result of prior investigations, law enforcement training, and successful controlled-substance prosecutions involving the use of the United States Mail, I have learned of certain common characteristics and/or circumstances that indicate that a package may contain Drugs and/or Criminal Proceeds. These circumstances and/or characteristics include, but are not necessarily limited to, the following: the mailer uses different post offices on the same day to send packages, the return address is false or non-existent, the addressee is not known to receive mail at the listed delivery

address, the package is heavily taped, the package is mailed from a known drug source location, the labeling information contains misspellings, the label contains an illegible waiver signature, unusual odors emanate from the package, and the listed address is located in an area of known or suspected drug activity.

3. On November 16, 2021, Postal Inspectors intercepted a package (hereinafter “the Package”) at the Dayton Processing and Distribution Center (PDC). The Package is a Priority Mail Express box wrapped in brown paper, bearing tracking number EI115082803US, postmarked November 15, 2021, with the following address information:

Sender: Antonio Amaya
2508 Kodiak Dr
Modesto CA
95313

Addressee: Seirra Salyer
1348 Texas Dr
Xenia OH
45385

Through training and experience as a Postal Inspector, I know the Northern California area is a known source for drug shipments throughout the United States.

4. I performed a check in CLEAR database for the addressee’s information on the Package of “Seirra Salyer 1348 Texas Dr Xenia OH 45385.” CLEAR is a law enforcement database that is used as a tool for investigators designed to link subjects to a particular address. According to CLEAR, there is no “Seirra Salyer” associated with 1348 Texas Dr, Xenia, OH 45385.

5. I also performed a check in CLEAR for the sender’s information listed on the Package of “Antonio Amaya 2508 Kodiak Dr Modesto CA 95313.” According to CLEAR, there is no “Antonio Amaya” associated with 2508 Kodiak Dr, Modesto, CA 95313. Also, according to CLEAR 2508 Kodiak Dr, Modesto, CA 95313 is not a valid address.

6. On November 16, 2021, at my request, Montgomery County Sheriff’s Office Detective Anthony Hutson conducted a narcotics-detection canine “free air” check of the outside of the

Package. I was present during said check. The Package was placed in a controlled area and presented to narcotics-detection canine, "Hank." As set forth in the attached affidavit of Detective Hutson, "Hank" alerted positively for the presence or odor of a narcotic or other controlled substance on the Package. "Hank" is a properly trained and certified narcotics-detection canine. *See Ex. 1.*

7. Based on my prior law enforcement training and experience as a United States Postal Inspector, the Package's address information, including (i) no known association between the sender and return address, (ii) no known association between the addressee and recipient address, and (iii) the positive alert of the narcotics-detection canine are all indicative of and consistent with Drugs and/or Proceeds in the Package. Therefore, a search warrant to open the Package is requested.

Further, your affiant sayeth naught.

Respectfully submitted,

Joseph L. Rossiter

Joseph L. Rossiter
Postal Inspector
United States Postal Inspection Service

Subscribed and sworn to and before me this 16th day of November, 2021.

Peter B. Silvain, Jr.
United States Magistrate Judge



Exhibit 1



UNITED STATES POSTAL INSPECTION SERVICE
PITTSBURGH DIVISION

OFFICER AFFIDAVIT

I, Deputy Anthony Hutson, am and have been employed by the Montgomery County Sheriff's Office since 1998. Among other duties, I am currently the assigned handler of narcotics detection canine "Hank" which is trained and certified in the detection of the presence or odor of narcotics described as follows:

Cocaine, Methamphetamine, Heroin, and their derivatives

On 11/16/2021, at the request of Postal Inspector ROSSITER, I responded to the DAYTON P&DC, where "Hank" did alert to and indicate upon: [describe item]

EI 115082803 US

| | |
|-----------------------|----------------------|
| <u>Antonio Anaya</u> | <u>Scirra Salyer</u> |
| <u>2508 Kodiak Dr</u> | <u>1348 Texas Dr</u> |
| <u>Madera CA</u> | <u>Xenia OH</u> |
| <u>95313</u> | <u>45385</u> |

Which, based upon my training and experience and that of "Hank", indicates there is contained within or upon the above described item, the presence or odor of a narcotic or other controlled substance.

D. J. H. - 101 11-16-21
(Signature, Badge #, and Date)

H. H. 11/16/2021
(Witness/Date)